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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**
9

10 UNITED STATES OF AMERICA,) **2:13-CR-00038-JCM-PAL**
11 Plaintiff,)
12 vs.) **STIPULATION FOR PROTECTIVE ORDER**
13 ANDREI RAILEANU,)
14 Defendant.)
15

16 IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden,
17 United States Attorney for the District of Nevada, and Kimberly M. Frayn, Assistant United States
18 Attorney, counsel for the United States, Gabriel L. Grasso, Esq., counsel for defendant ANDREI
19 RAILEANU, that this Court issue an Order protecting from disclosure to the public any discovery
20 documents containing the personal identifying and financial identifying information, such as
21 social security numbers, drivers license numbers, dates of birth, bank account numbers, credit and
22 debit card numbers, and addresses, of participants, witnesses and victims in this case. Such
23 documents shall be referred to hereinafter as "Protected Documents." The parties state as follows:

24 1. Protected Documents which will be used by the government in its case in chief
25 include personal identifying information and financial identifying information, such as social
26

1 security numbers, drivers license numbers, dates of birth, bank account numbers, credit and debit
2 card numbers, and addresses, of participants, witnesses, and victims in this case.

3 2. Discovery in this case includes many of documents which contain personal and
4 financial identifiers. Redacting the personal and financial identifiers of participants, witnesses,
5 and victims would prevent the timely disclosure of discovery to defendants.

6 3. The United States agrees to provide Protected Documents without redacting the
7 personal identifiers and financial identifiers of participants, witnesses, and victims.

8 4. Access to Protected Documents will be restricted to persons authorized by the
9 Court, namely defendant, attorney(s) of record and attorneys' paralegals, investigators, experts,
10 and secretaries employed by the attorney(s) of record and performing on behalf of defendant.

11 5. The following restrictions will be placed on defendant, defendant's attorney(s) and
12 the above-designated individuals unless and until further ordered by the Court. Defendants,
13 defendants' attorneys and the above-designated individuals shall not:

14 a. make copies for, or allow copies of any kind to be made, by any other
15 person of Protected Documents;

16 b. allow any other person to read Protected Documents; and

17 c. use Protected Documents for any other purpose other than preparing to
18 defend against the charges in the Indictment or any further superseding indictments arising out of
19 this case.

20 6. Defendant's attorney(s) shall inform any person to whom disclosure may be made
21 pursuant to this order of the existence and terms of this Court's order.

22 7. The requested restrictions shall not restrict the use or introduction as evidence of
23 discovery documents containing personal identifying and financial identifying information, such as
24 social security numbers, drivers license numbers, dates of birth, bank account numbers, credit and
25 debit card numbers, and addresses, of participants, witnesses and victims during the trial of this
26 matter.

8. Upon conclusion of this action, defendant's attorney(s) shall return to government counsel or destroy and certify to government counsel the destruction of all discovery documents containing personal identifying and financial identifying information such as social security numbers, drivers license numbers, dates of birth, bank account numbers, credit and debit card numbers, and addresses, within a reasonable time, not to exceed thirty days after the last appeal is final.

DANIEL G. BOGDEN
United States Attorney

/s/ Kimberly M. Frayn
KIMBERLY M. FRAYN
Assistant United States Attorney

February 22, 2013
DATE

/s/ Gabriel L. Grasso, Esq.
GABRIEL L. GRASSO, ESQ.
Counsel for defendant
ANDREI RAILEANU,

February 22, 2013
DATE

ORDER

IT IS SO ORDERED this 49th day of February, 2013.


UNITED STATES MAGISTRATE JUDGE